



Regional sulphur emission limits at a glance

Decarbonisation remains a key focus for the shipping sector, and the IMO continues to strengthen measures aimed at improving air quality in coastal areas, including the expansion of MARPOL designated sulphur emission control areas. In parallel, many regions, states, and individual ports enforce their own strict sulphur emission limits to protect public health.

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From time to time, Members and clients contact Gard for advice following fines for burning non-compliant fuel in ports or waters subject to stricter sulphur emission requirements. In some cases, ships may have unintentionally burned fuel with a sulphur content exceeding the permissible limit, for example due to inaccuracies in the bunker delivery note (BDN). However, most cases appear to stem from insufficient familiarity with the applicable local air emission regulations among ship operators and crews.

Actions for compliance

A number of regions, states and ports have introduced their own strict sulphur emission limits. To support compliance, we provided an overview of applicable regulations that may assist ship operators and crews in identifying relevant requirement.

However, local regulations may change with limited public notice, and enforcement practices can vary between jurisdictions. Masters should therefore seek up-to-date guidance from local agents well in advance of any intended port call. In addition, ship operators are encouraged to:

Ensure that crews are familiar with sulphur emission limits applicable to their trading areas and are provided with clear procedures and guidance.

Assess fuel options and make sure that the fuels used meet the applicable sulphur content requirements.

Where more than one fuel grade is carried, ensure that fuel change-over procedures allow sufficient time to flush non-compliant fuel from the system before entering a controlled area.

Where exhaust gas cleaning systems (scrubbers) are used, confirm acceptance of such systems with the relevant authorities. Crews on vessels equipped with open-loop scrubbers should also beware of local restrictions on washwater discharge. The Exhaust Gas Cleaning System Association (EGCSA) provides an overview of local regulations through its [SOx regulation map](#) .

The overview below can be used as a practical reference but should not be considered exhaustive. *Future requirements are indicated in italic* .

MARPOL designated emission control areas (ECAs)

The entry into force of the global 0.50 per cent sulphur limit has not altered the requirements applicable within the ECAs designated under [Regulation 14 of MARPOL Annex VI](#) . The 0.10 per cent sulphur limit applies within the North American, US Caribbean, North Sea, Baltic, and Mediterranean Sea ECAs. The same limit will also apply in the Norwegian Sea, Canadian Arctic, and North-East Atlantic ECAs once these enter into force.

In October 2024, IMO MEPC 82 adopted amendments to MARPOL Annex VI designating the Norwegian Sea and the Canadian Arctic waters as ECAs. These amendments will enter into force on 1 March 2026, but the 0.10% sulphur limit will take effect after a 12-month grace period as per Regulation 14.7 of MARPOL Annex VI, i.e., from 1 March 2027. The details are provided in [IMO Resolution MEPC.392\(82\)](#) .

In May 2026, IMO MEPC 84 adopted additional amendments to MARPOL Annex VI, designating the North-East Atlantic Ocean as an ECA, linking existing ECAs in Europe to the Canadian Arctic ECA. These amendments will enter into force on 1 September 2027, with the 0.10 per cent sulphur limit taking effect on 1 September 2028. The details are provided in IMO Resolution MEPC.407(84).

Please also refer to the IMO website: [Emission Control Areas \(ECAs\) designated under MARPOL Annex VI](#) .

As the number of MARPOL designated ECAs increases, some areas will wholly or partially overlap with existing local emission control regimes. One example is the Mediterranean Sea ECA, where the requirements overlap in part with the national legislation adopted by Israel.

European Union (EU)

Under the [EU Sulphur Directive](#) , ships at berth in EU ports must use marine fuels with a sulphur content not exceeding 0.10 per cent and complete any necessary fuel changeover operation as soon as possible after arrival at berth and as late as possible before departure.

While guidance on the permissible time for crew to complete a fuel changeover operation may vary depending on port and ship type, most port authorities allow one hour to complete the operation. Ships are expected to have compliant fuel onboard upon arrival at the berth and additional delays in the changeover operation caused by time spent procuring and taking delivery of compliant fuel after berthing may not be accepted. Ships that, according to published timetables, are due to be at berth for less than two hours are explicitly exempted from the requirement, so are ships that switch off all engines and use shore-side electricity while at berth in ports.

‘Ships at berth’ means ships which are securely moored at berth or at an anchor in an EU port. With delimitations of each port being established locally, Masters should always confirm with ships’ local agent whether an outer anchorage is considered to fall within the port limits for the purposes of sulphur emission compliance.

Türkiye

Türkiye is not a member of the EU but its [sulphur emission regulation](#) is aligned with that of the EU. Hence, all ships are required to use marine fuels with a sulphur content not exceeding 0.10% while at berth in Turkish ports or operating in Turkish internal waters. The requirement does not, however, apply to ships transiting the Turkish Bosphorus and Dardanelles Straits and the Marmara Sea (outside the Mediterranean Sea ECA), unless their transit process, e.g. a stay at an anchorage or in a port whilst awaiting passage, exceeds two hours. Our Turkish correspondent [Vitsan’s Circular of 22 April 2025](#) clarifies the impact of the Mediterranean Sea ECA on local Turkish emission requirements.

Israel

A new Israeli regulation came into effect on 23 February 2023, requiring ships berthed in Israeli ports to use marine fuel with a sulphur content not exceeding 0.1% by mass. Alternative solutions for compliance, such as exhaust gas cleaning systems (scrubbers), are also accepted. According to the [Israeli Ministry of Transportation and Road Safety](#), the new regulation put in place measures that are similar to those set forth by the EU Sulphur Directive. The regulation applies to ships moored alongside as well as ships anchored within port limits and requires the fuel changeover operation to be completed as soon as possible after arrival at berth/anchorage and as late as possible before departure. For detailed information on the new regulation, please refer to the Israeli government’s [Notice MP 27 of 11 January 2023](#).

While most major Israeli ports face the Mediterranean Sea and are subject to the MARPOL ECA requirements, there will be exceptions, such as Eilat Port in the Gulf of Aqaba, Red Sea.

Norwegian World Heritage fjords

Since 1 March 2019, the North Sea ECA 0.10% sulphur limit has been extended to include the entire Norwegian World Heritage fjord area, including the Nærøyfjord, Aurlandsfjord, Geirangerfjord, Sunnlyvsfjord and Tafjord in Western Norway. The exact coordinates of the sea areas included in the World Heritage fjords are outlined in the Norwegian regulation on [environmental safety for ships and mobile offshore units](#) .

Ships of 10,000 gross tonnes and above sailing in the World Heritage fjords are also required to carry a ship-specific environmental instruction tailored to operations in these fjords. The instruction should ensure that the ship is operated with the lowest possible environmental impact through technical and operational measures, as well as crew training. As a minimum, it should address measures to reducing particle matter emissions and visible smoke, as well as speed management as a means of reducing emissions and discharges. The Norwegian Maritime Administration's [guidelines for developing an environmental instruction for operations in the Norwegian World Heritage fjords](#) provide additional details.

Note: While not directly related to sulphur emissions, Norway has introduced [zero-emission requirements](#) for passenger vessels operating in its World Heritage fjords. Since 1 January 2026, passenger vessels of less than 10,000 gross tonnage have been required to use energy sources that do not cause direct emissions of carbon dioxide (CO₂) or methane (CH₄) while operating in the fjords. *The same requirements will apply to larger passenger vessels from 1 January 2032.*

Iceland

Since 1 January 2020, the permissible sulphur content of marine fuels used in Iceland's territorial sea and internal waters, i.e. including the fjords and bays, has been limited to 0.10%, aligning with the requirements applicable in the MARPOL designated ECAs. Iceland's territorial sea extends 12nm from its coastline. Please refer to the website of the [Government of Iceland](#) for additional information.

From 1 September 2028, the Iceland will also fall within the MARPOL designated North-East Atlantic Ocean ECA.

China

In September 2015, China designated its own domestic ECAs and announced a gradual implementation of requirements covering emissions of air pollutants from ships. At the time of writing, a Coastal ECA has been designated and includes all sea areas and ports within China's territorial sea, as well as a specially designated ECA in China's southernmost province Hainan, the Hainan Coastal ECA. In addition, two Inland ECAs have been designated which include parts of the Yangtze and Xi Jiang Rivers.

While China currently [continues to apply a 0.50% sulphur cap in its Coastal ECA](#) , ships destined for the Yangtze and Xi Jiang Rivers, or the Hainan province must use fuel with a sulphur content not exceeding 0.10% while operating within the defined ECAs. Any fuel changeover operation must be completed prior to the entry into or commenced after exit from an ECA.

The exact coordinates and maps of China's domestic ECAs are included in our correspondent Huatai Insurance Agency's [Circular PNI1816](#) of 13 December 2018. It is worth noting that China has declared straight baselines along parts of its coast. This means that China's baseline, from which its 12nm territorial sea limit must be measured, can lie many nautical miles off its coast.

South Korea

In line with China, South Korea has designated its own domestic ECAs and announced a gradual implementation of requirements covering emissions of air pollutants from ships. The ECAs cover South Korea's five major port areas: Incheon, Pyeongtaek-Dangjin, Yeosu-Gwangyang, Busan and Ulsan: Please refer to the [Korean Ministry of Oceans and Fisheries' \(MOF\) announcement on 19 August 2020](#) for details.

At the time of writing, ships are required to use fuel with a maximum sulphur content of 0.10% at all times while operating within the South Korean domestic ECAs. Any fuel changeover operation must be completed prior to the entry into or commenced after exit from an ECA. The Korean Register's [Technical Information](#) of 20 January 2020 includes the exact coordinates for the different domestic ECAs.

Sydney, Australia

Following concerns raised by residents living near the White Bay Cruise Terminal in Sydney, the Australian Maritime Safety Authority (AMSA) implemented a 0.10% limit on sulphur emissions from cruise vessels berthing in Sydney Harbour. 'Cruise vessel' means a vessel not having a cargo deck, designed exclusively for carriage of over 100 passengers in overnight accommodation. The limit on sulphur emissions applies from one hour after the vessel's arrival at berth until one hour before the vessel's departure. Additional details are outlined in AMSA's [Marine Notice No.02/2024](#) .

Panama Canal

Panama is outside of the MARPOL designated ECAs and therefore the global 0.50% sulphur cap applies. However, at the time of writing, vessels arriving to Panama Canal (ACP) water “ *shall be presented with their main propulsion engines, boilers, auxiliary generator engines, and other ancillary equipment running on a compliant fuel or scrubber arrangement* ”. Compliant fuels include distillate marine fuel, VLSFO or ULSFO with maximum kinematic viscosity of 70 centistokes @50°C, zero carbon fuels, and other alternative fuels. Scrubber arrangements must be of a closed loop-type and set in zero discharge mode. The geographic limits of ACP waters, as well as information on alternative solutions that may be accepted by the Panama Canal Authorities, are set out in its [Shipping Notice N-01 “Vessel Requirements](#) ”, which is updated annually.

California, USA

Although Californian waters fall within the North American ECA designated under MARPOL Annex VI, the state continues to apply its own low sulphur fuel regulations, the California Air Resource Board (CARB) Ocean-Going Vessel (OGV) Fuel Regulation. Ships operating within 24nm of California's coastline are therefore subject to two separate sets sulphur emission regulations.

While both regulations specify a sulphur limit of 0.10%, the CARB OGV Fuel Regulation requires that the fuel also meet the specifications for distillate grades (marine gas oil or marine diesel oil) and does not permit compliance via exhaust gas cleaning systems. However, certain alternative fuels are accepted as compliant with the Regulation, including natural gas, propane, ethanol, methanol, hydrogen, electricity, and energy supplied through fuel cells. Additional information is available via the [CARB OGV Fuel Regulation website](#) and a detailed comparison of the two set of regulations that apply in Californian waters can be found in CARB's [Marine Notices 2025-1, 2020-2 and 2020-1](#) .

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